

Exhibit 3

I, Misty Gayle White, swear and affirm under penalty of perjury that the following information is true and correct:

1. I am a 40 year old Native American woman. I am a citizen of Cherokee Nation.
2. I was arrested on November 16, 2019 for a violation of VPO. The arresting officer did not tell me ~~how~~ ^{mm} how I had violated the VPO. He roughed me up and put me in the police car.
3. I told the arresting officer that I take medications and that I can't stop taking them abruptly. I also told the officer that I didn't have shoes on. I asked the officer to go into the house and get my medications and shoes. He came out of my house with the medication, but no shoes.
4. They took me to the Canadian County Jail ^{mm} in the afternoon of November 16, 2019. I told the booking officers that I take medication and that it can cause seizures if I stop abruptly.
5. I have been diagnosed with bipolar, severe depression, severe anxiety, and PTSD. I also have interstitial cystitis, which is a painful, chronic bladder disease. To manage the pain, I have been prescribed Percocet and other painkillers. Since February 2019, I have been prescribed and taken methadone to manage withdrawal after I stopped taking Percocet. ~~Stopping methadone abruptly can cause heart problems.~~ ^{mm} Stopping methadone abruptly can cause heart problems. To manage my psychiatric disabilities, I have been prescribed and taken various medications. Some of those are also dangerous to stop abruptly.

6. The booking officer didn't respond when I told him about my medications.
7. Later in the afternoon on November 16, 2019, I went to intake to see a nurse. While I was waiting to see the nurse, I noticed a folder on a shelf that said "suicidal" and another one that said "withdrawal." I asked the inmate next to me what happens if you're suicidal. I was not suicidal. I was just curious what the protocol was. I am a medic by training, I was just interested.
8. An officer overheard the question, and went to talk to the nurse. The nurse called me into the office. The nurse asked if I was suicidal. I said no. I told the nurse about my medications. She said, "we don't ~~can~~ treat anxiety here." About the methadone, alprazolam, and trazadone, she said, "we don't hand those out here."
9. An officer escorted me from the nurse's office to an isolation cell. The officer told me to take off my clothes and put on a "turtle suit." It was a stiff, sleeveless piece of clothing with velcro. I initially refused. The officer told me if I did not comply, a male officer would come in and disrobe me forcefully. I put on the turtle suit.
10. ~~the~~ I think that's when the officer told me I was being put on "status" because they thought I was suicidal. I repeatedly told everyone that I was ~~not~~ suicidal. They kept me in the isolation cell for ~~4~~ 4 days on status anyway.

11. It was cold in the isolation cell. There was no bed, just a concrete bench. There was no real blanket, just something made out of the same turtle suit material. My turtle suit velcro did not work and it would not stay closed. I had no comfort. The lights stayed on all the time. It was horrible and degrading.

12. I didn't get any of my medications while I was on status. I had withdrawal symptoms from stopping all the medications at once. ~~When~~ I felt like I was breaking down. I kept telling everyone that I was not suicidal, but they said no one could get me out until the nurse came on ~~Wednesday~~ Thursday.

13. On Tuesday, November 19, I showed a nurse the painful irritation the turtle suit was causing on my chest. The nurse said she would try to do something, and a few hours later the nurse practitioner came, did a psych eval, and let me out of the isolation cell. I had been in isolation since Saturday, November 16.

~~When I came back to the cell, I was told that I was not allowed to leave the cell.~~

14. The day after I was booked, I was taken out of the isolation cell to see a judge through a video monitor. The judge read my charges and said my bail was \$3500. The judge did not ask me anything about my ability to pay the bail. The proceeding lasted about a minute. I could not afford the \$3500 bail.

15. I was intimidated. I didn't know the rules. I didn't understand what they thought I had done to violate the VPO. I didn't know if I could ask any questions.

16. I wish I had had a lawyer. It felt very one-sided. I had not yet gotten an application for a public defender.

17. I was experiencing withdrawal from medications, insomnia, and I had a horrible headache at the proceeding with the judge. This made it much harder to understand what was happening and to stand up for myself. I was very afraid.

18. Nine days later, on November 26, I was arraigned. I saw the same judge through the same video screen in the same room in the jail. A charge of obstructing an officer had been added, and the judge increased my bail to \$4500. I could not afford this bond.

19. The judge didn't ask me anything except my personal identifying information as far as I remember. She didn't ask if I could afford the bail. She didn't ask if I had a job. The whole thing lasted about a minute.

20. The officer told ~~us~~ ^{me} while we were waiting for arraignment that if we talked while we were waiting, the officer would take us back to the cell and we would have to wait another week before arraignment. The officer sent two people back to their cells before they were arraigned. I was afraid and stressed and anxious at the arraignment, and the officer's attitude made it worse. I was worried that other inmates or the officer would get me in trouble.

21. There are some things that would have made it easier for me to focus and participate in the arraignment. I had been in lockdown in a small, crowded cell 23 hours a day for a week before arraignment. Being in the hallway

waiting for arraignment with so many other people caused sensory overload. There ~~were~~ ^{was} too many people and too much noise and this ~~exacerbated~~ ^{exacerbated} my disabilities. I was very afraid and intimidated. I had been off most of my medications for 10 days at arraignment, which also exacerbated my disabilities.

22. I cannot afford my bail because I left my job as a medic to take care of my daughter. I started working for Postmates and DoorDash, but due to car trouble and illness, I had to stop working. I am behind in my bills and I don't have any savings.

23. I don't have any family or friends who can afford to bail me out.

24. The judge did not give me any reasons why she set my bail at \$4500.

25. There was no lawyer to represent me at the arraignment. I cannot afford a private lawyer.

26. I filled out an application for the public defender on the day of my arraignment. I have asked about it every day since then, but I still don't know if I have a public defender. I could not afford the \$40 application fee. My next court date for my criminal case is December 18. I have heard that if you don't have a lawyer assigned on your court date, they don't take you to court.

27. I have been in jail for 22 days.

28. I have suffered a lot in these 22 days. The water has been cut off twice with no warning for hours, and this raised my anxiety a lot. We have been in lockdown 23 to 24 hours a day the whole time since I got off status. I have not been outside or gotten fresh air since I got here 22 days ago.

29. I cannot eat a lot of the food the jail gives me. I don't eat pork for religious reasons. I told the booking officer that I don't eat pork, and she said something like, there's going to be a lot of meals you won't be able to eat. Lunch every day is hot dogs or ham. There is frequently ham or pork for dinner. I go hungry a lot. They don't give me any different trays. Today for lunch I ate fritos and 2 pieces of white bread.

30. The jail has refused to give me most of the medications I need. The methadone withdrawal was bad, and my pain is bad. My insomnia has gotten worse. I wouldn't dare seek medical help for my disabilities for fear of being put back in isolation.

31. Because I can't afford my bond, I missed visitation with my daughter. I missed a CPS hearing because the jail doesn't pull people out for CPS hearings. I missed a car payment. Because I cannot afford my bond, I have not been able to work. Because I cannot afford my bond, I have suffered an insurmountable amount of loss.

I gave Zoe Brennan-Krohn permission to handwrite this statement. I reviewed this statement with Megan Lambert, Laura Beth Cohen, and Zoe Brennan-Krohn and it is true and correct.

I sign this statement under penalty of perjury.

Date: 12/8/2019

Signature: [Signature]